

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VENTAS REALTY, LIMITED)
PARTNERSHIP,)
Plaintiff,)
v.) No.: 12-cv-3107
ALC CVMA, LLC, ALC GGMG, LLC,)
ALC HTIF, LLC, ALC PEDG, LLC, ALC)
TPCG, LLC, ALC WRWG, LLC, and)
ASSISTED LIVING CONCEPTS, INC.,)
Defendants.)
Judge Ronald A. Guzman
Magistrate Judge Sidney I. Schenkier

**DECLARATION OF JOHN A. ROTHSTEIN, ESQ. IN SUPPORT OF MOTION OF
DEFENDANT ASSISTED LIVING CONCEPTS, INC. FOR A PROTECTIVE ORDER
PURSUANT TO RULE 26 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

JOHN A. ROTHSTEIN, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an attorney duly admitted to practice law in the State of Wisconsin. I am a member of the General Bar of the United States District Court for the Northern District of Illinois and have appeared in this action. I am a partner at the law firm of Quarles & Brady LLP, counsel to defendants in this action.

2. Attached as Exhibit A hereto is a true and correct copy of Ventas Realty, Limited Partnership's Motion for Expedited Discovery, filed on May 15, 2012, which attaches Plaintiff's First Set of Interrogatories to Defendants, Plaintiff's First Set of Requests for Production of Documents to Defendants, and Notice of Deposition of Assisted Living Concepts, Inc., dated May 15, 2012.

3. Attached as Exhibit B hereto is a true and correct copy of the transcript of the May 17, 2012 hearing on Ventas Realty, Limited Partnership's Motion for Expedited Discovery.

4. Attached as Exhibit C hereto is a true and correct copy of Defendants' Responses and Objections to Plaintiff's First Set of Interrogatories to Defendants and Plaintiff's First Set of Requests for Production of Documents, dated May 31, 2012.

5. Attached as Exhibit D hereto is a true and correct copy of Notice of Deposition of Assisted Living Concepts, Inc., dated May 31, 2012.

I certify, under penalty of perjury, that the foregoing statements are true.

Dated: Chicago, Illinois
June 5, 2012

/s/ John A. Rothstein
John A. Rothstein